



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, New York 10007*

November 25, 2020

By ECF

Honorable Sarah Netburn
United States Magistrate Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Terrorist Attacks, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

We write respectfully to request a modification of the schedule endorsed by the Court on October 28, 2020 (ECF No. 6514), regarding redaction of information subject to the FBI Protective Order in the briefing papers relating to the Court's July 20, 2020 Opinion and Order. Specifically, the FBI requests that the remaining schedule be modified as follows:

December 14, 2020: Deadline for the FBI to notify Plaintiffs and Mr. Alzamari of additional proposed redactions or opposition to proposed redactions. (Current deadline: November 30, 2020)

January 4, 2021: Deadline for Plaintiffs and Mr. Alzamari to file the redacted briefing papers consistent with the October 2, 2020 Opinion & Order or to submit any disputes to the Court. (Current Deadline: December 13, 2020)

We make this request to permit the FBI sufficient time to review the parties' proposed redactions to the briefing papers. Pursuant to the Court-endorsed schedule, November 9 was the "[d]eadline for Plaintiffs and Mr. Alzamari to propose redactions for the briefing papers filed in connection with the July 20 Order"; and November 30 is the "[d]eadline for the FBI to notify Plaintiffs and Mr. Alzamari of additional proposed redactions or opposition to proposed redactions." Mr. Alzamari's counsel provided proposed redactions to his motion papers on November 9, 2020. However, the Plaintiffs' Executive Committees ("PECs") did not provide proposed redactions to their motion papers until November 23, 2020. Based upon a preliminary review, the FBI has

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determined that it will be necessary to propose additional redactions to the PECs' papers. Moreover, the FBI personnel responsible for reviewing proposed redactions will be on leave this week for the Thanksgiving holiday. Accordingly, the FBI respectfully requests an additional two weeks, or until December 14, 2020, to propose further redactions to the parties' motion papers.

After conferring with the parties, we also respectfully request a three-week extension, to January 4, 2021, of the December 13 "[d]eadline for Plaintiffs and Mr. Alzamari to file the redacted briefing papers consistent with the October 2, 2020 Opinion & Order or to submit any disputes to the Court." The additional week is requested because of the intervening holidays.

Counsel for Plaintiffs, Mr. Alzamari, the Kingdom of Saudi Arabia and Dallah Avco consent to this request. We thank the Court for its consideration.

Respectfully,

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By: /s/ Sarah S. Normand

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